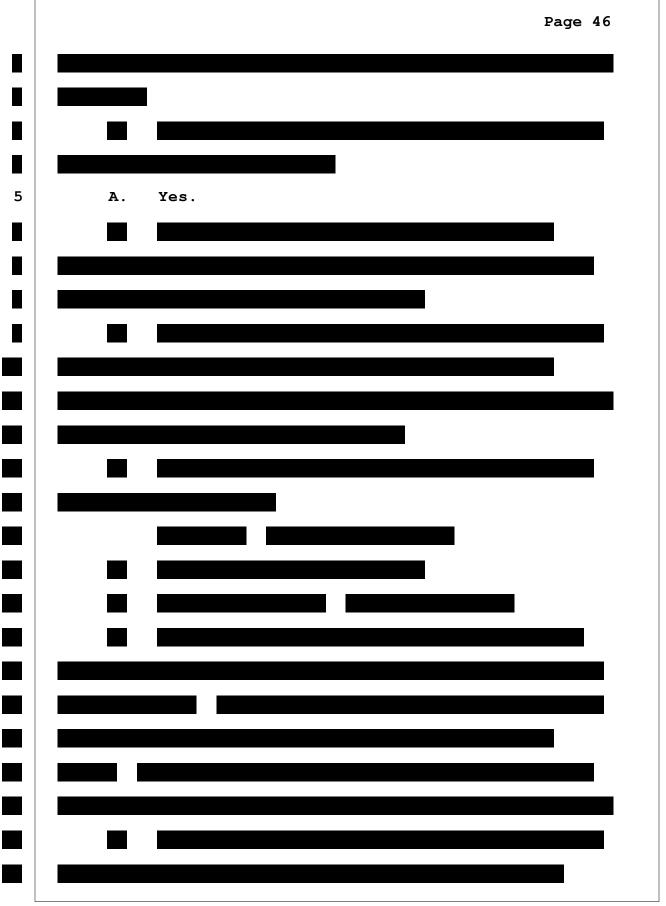
EXHIBIT 19 REDACTED

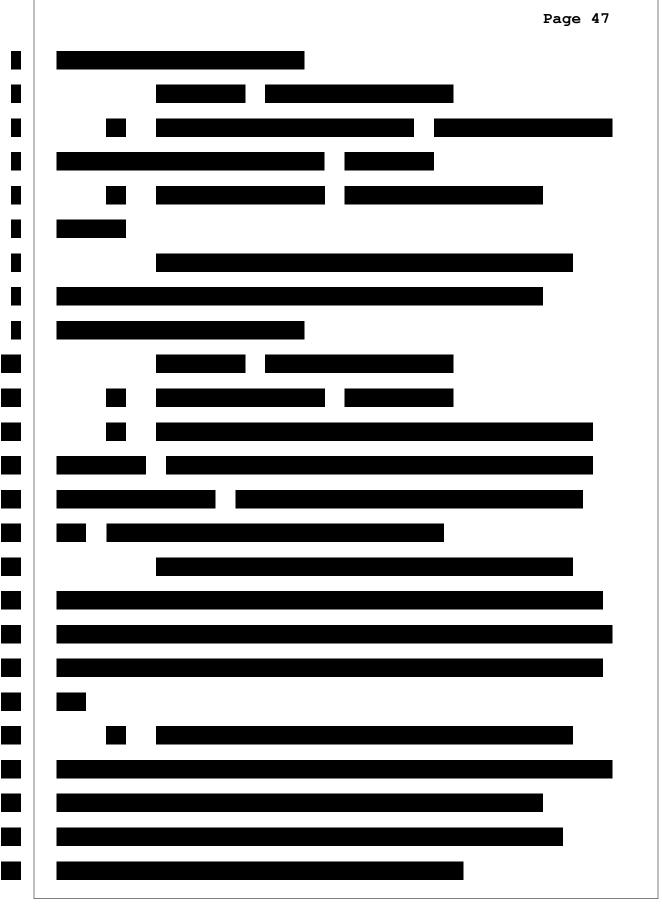
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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE
In Re:)
)
) No. 2:21-cv-00563-JCC
VALVE ANTITRUST LITIGATION)
)
VIDEO-RECORDED DEPOSITION UPON ORAL EXAMINATION OF
KASSIDY GERBER
*** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY ***
9:05 A.M.
THURSDAY, OCTOBER 5, 2023
701 FIFTH AVENUE, SUITE 5100
701 FIFTH AVENUE, SUITE 5100 SEATTLE, WASHINGTON
SEATTLE, WASHINGTON

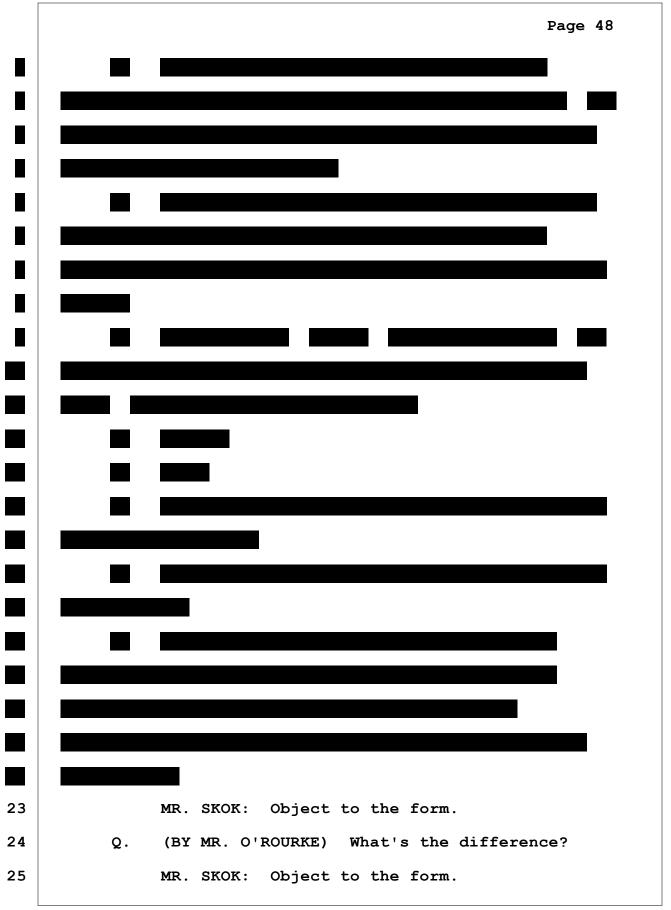
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1	have you had any kind of training on any topic that you
2	understood to relate to antitrust?
3	MR. SKOK: And, again, Ms. Gerber, to the
4	extent you can answer this without disclosing
5	attorney-client communications, you may. But to the
6	extent that he's asking you about the content of
7	communications you've had with lawyers, that's
8	attorney-client privilege, so please don't disclose
9	that.
LO	THE WITNESS: Okay.
L1	Q. (BY MR. O'ROURKE) So it's a yes-or-no
L2	question. Either you've had the training or you have
L3	not.
L 4	MR. SKOK: Well, to the extent that she's had
L5	those communications with lawyers, you're asking about
L 6	the substance of those attorney-client communications.
L 7	That's the type of communication that I'm
18	instructing you not to answer.
L 9	THE WITNESS: Okay.
20	Q. (BY MR. O'ROURKE) Your answer?
21	A. I'm not going to answer.
22	Q. You're refusing to answer?
23	A. Yes.
24	MR. SKOK: Well, she's been instructed not to
25	answer. I think she's following counsel's instructions.

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1	MR. O'ROURKE: So just so we're very clear,
2	Mr. Skok
3	MR. SKOK: Skok, please. Skok.
4	MR. O'ROURKE: Skok. Thank you.
5	MR. SKOK: Thank you.
6	MR. O'ROURKE: You the position you're
7	taking now in instructing the witness not to answer is,
8	I am not permitted to ask an employee of Valve whether
9	or not that employee has had compliance training on
10	antitrust?
11	MR. SKOK: No. The question is asking for the
12	substance of what kind of training she may have had by
13	counsel. To the extent there's a training by counsel,
14	that would disclose the substance of attorney-client
15	communications. The instruction is not to answer in a
16	way that discloses the substance of attorney-client
17	communications. I did tell the witness if she can
18	answer otherwise, then she's free to.
19	Q. (BY MR. O'ROURKE) My question is: Have
20	you during the time you've worked at Valve, about 11
21	and a half years, have you had training on antitrust
22	compliance?
23	MR. SKOK: And the same instructions,
24	Ms. Gerber.
25	Q. (BY MR. O'ROURKE) You need to answer.

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1	A. No. I'm not answering.
2	MR. SCHENCK: Why don't we take a break, see
3	if we can figure this out.
4	MR. SKOK: Yeah. It's probably a good time
5	for a break to consult on some of these issues
6	MR. O'ROURKE: Take a break.
7	MR. SKOK: as well as we've been going
8	about an hour.
9	THE VIDEOGRAPHER: The time is 9:56 a.m. And
10	we're going off the record.
11	(Brief break taken.)
12	THE VIDEOGRAPHER: The time is 10:09 a.m. And
13	we're back on the record.
23	Q. (BY MR. O'ROURKE)







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Q.	So I'm just trying to understand the
distinc	tion between the two situations, where in both
cases a	Steam customer is buying the game and then, in
this si	tuation, learning that it's for sale at a lower
price,	why does it matter if the lower price is on Steam
or the	lower price is on another online store?
A.	Can you repeat the question.
Q.	Sure.
	What's the distinction between a Steam
custome	er who buys on Steam two days before a sale on
Steam,	versus the Steam customer who buys on Steam and
then le	earns two days later the same game is for sale at
a lower	price on a different store?
A.	I don't I don't think there is a
distinc	tion. I think that's I don't have an issue
with th	at.

